

CORRES CONTROL
OUTGOING LTR #

DOE ORDER #

05-RF-00925

DIST	LTR	ENC
CROCKETT, G		
FERRERA, D.W.	X	X
GILPIN, H.E.		
LONG, J.W.		
LINDSAY, D. C.		
SHELTON, D.C.		
TUOR, N.R.		
NYDER, D		
LAPPERT, R. D.		
GILLESPIE, D. R.		
NESTA, S.	X	X

October 6, 2005

05-RF-00925

Richard J. Schassburger, Director
Headquarters Cadre Project Management
DOE, RFPO

TRANSMITTAL OF RESPONSE TO COLORADO DEPARTMENT OF HEALTH AND
ENVIRONMENT (CDPHE) COMMENTS OF DECOMMISSIONING CLOSEOUT REPORT FOR
BUILDING 331 GARAGE -- DWF-103-05

Enclosed are the responses to CDPHE comments on the Final Decommissioning Closeout
Report for the Building 331 Garage.

Transmittal to the CDPHE and the Environmental Protection Agency, in accordance with the
Rocky Flats Clean-Up Agreement, is requested.

If you have any questions, please contact Steve Nesta at extension 6386.

CORRES CONTROL	X	X
ATS		
DMN. RECORD	X	X
ASTE REC CTR		
CAFFIC		

Dennis W. Ferrera
Vice President and Project Manager
Remediation, Industrial D&D, and Site Services

CLASSIFICATION:		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

SMN:rlm

AUTHORIZED CLASSIFIER
SIGNATURE:

Enclosure:
As Stated

te:

IN REPLY TO RFP CC #: Original and 1 cc - Richard J. Schassburger

ACTION ITEM STATUS:

cc:
John Rampe

- ☐ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

st Name)
st Name)

RIG. & TYPIST INITIALS:

SMN:rlm

Letter # DWF-103-05

Kaiser-Hill Company, L.L.C.

Rocky Flats Environmental Technology Site, 10808 Highway 93, Unit B, T130F, Golden, CO 80403-8200 • (303) 966-6386

ADMIN RECORD

1A-A-002846

1/14

SUMMARY OF B331 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

- 1) Per previous agreements (see CR dated 5/25/05 between Freiboth and Kruchek), the potentially contaminated trenches and drains were supposed to have been 1) protected, segregated and removed with appropriate rad controls, 2) RCTs would perform surveys and ER would collect samples based on evidence of possible releases, and 3) the Closeout Report would contain results of all such actions taken during demolition or document the rationale why actions were not taken. As such, please provide a discussion and specific information as agreed. (The characterization information provided in Appendix 3 was not collected to meet this need.) This information should provide specific information regarding the characterization and disposition of the potentially contaminated drains, pipes and trenches.

RESPONSE:

The potentially trenches and drains were protected during the demolition of the upper portion of the facility. The trenches and drains were then uncovered during their removal and surveyed in process. The surveys did not indicate the presence of any contamination, however according to the RISS Radiological Engineering Manager, the onsite Radiological Engineer decided to manage the concrete debris as low level waste. The low level waste was transferred to the debris pile at the B664 location and ultimately loaded into rail cars.

- 2) Appendix 2 - Please provide the relevant contact information, and remove non-relevant information (not applicable to B331G), such as the CR for B331F, etc. Why doesn't this include the RLCR/PDSR approval, and RSOP Notifications, as well as other relevant information, including the CR mentioned above?

RESPONSE:

This oversight has been corrected. Please find attached the following significant documents supporting decisions for B331G:

- Transmittal letter from Kaiser-Hill to DOE for B331G RLCR, May 20, 2005
- Contact Record entitled B331G Asbestos Abatement, May 25, 2005
- Transmittal letter from DOE to CDPHE for B331 RLCR, June 7, 2005
- Transmittal of RSOP Facility Disposition Notification for B331G from Kaiser-Hill to DOE, June 8, 2005
- Transmittal of RLCR/PDSR Concurrence and Approval letter from CDPHE, June 9, 2005
- Demolition Approval Notice from CDPHE, June 16, 2005
- Transmittal of RSOP Facility Disposition Notification for B331G from DOE to CDPHE, June 29, 2005
- Transmittal letter of approval and concurrence for the RSOP Facility Disposition for B331G, June 30, 2005

RECEIVED 2002

2005 MAY 26 P 11:33

CORRESPONDENCE
 CONTROL

05-RF-00520



CORRES. CONTROL OUTGOING LTR. NO.		
DOE ORDER 4700.1		
05-RF-00520		
DIST.	LTR	ENC
DIETER, T.J.		
FERRERA, D.W.	X	
LINDSAY, D.C.		
LONG, J.		
LYLE, J.L.		
MARTINEZ, L.A.		
PIZZUTO, V.M.		
SHELTON, D.C.		
SPEARS, M.S.		
TUOR, N.R.		

BEAN, C.		
CLARK, D.		
FREIBOTH, C.		
GIBBS, F.	X	
GOLDEN, L.	X	X
HUMISTON, T.		
JENKINS, T.		
NESTA, S.	X	
PARSONS, D.		
WIEMELT, K.		
PRIMROSE, A.	X	
LINSINBGLER, H.		
SWARTZ, M.	X	
CABLE, J.		
NININGER, R.		

CORRES. CONTROL	X	X
ADMIN RECD/T130G	X	X
TRAFFIC		
PATS130		

CLASSIFICATION:		
UCNI		
UNCLASSIFIED	X	Y
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER	
SIGNATURE: <i>[Signature]</i>	X
Date: 05/26/05	
IN REPLY TO RFP CC NO.:	

ACTION ITEM STATUS:	
<input checked="" type="checkbox"/> PARTIAL/OPEN	<input type="checkbox"/> CLOSED
LTR APPROVALS:	
ORIG. & TYPIST INITIALS:	
DLP:pm	

Gary Morgan, Functional Lead
 Cadre Project Management Division
 DOE, RFPO

TRANSMITTAL OF THE BUILDING 331 GARAGE - RECONNAISSANCE LEVEL
 CHARACTERIZATION REPORT/PRE-DEMOLITION SURVEY REPORT (RLCR/PDSR)
 DWF-036-05

Provided for your review and approval is the enclosed subject report for the Building 331 Garage. This report characterizes the physical, chemical and radiological hazards associated with this facility, summarizes the characterization activities, defines the Data Quality Objectives developed for this characterization, and presents the data quality assessment, verification and validation of results. Building 331 Garage was an "anticipated" Type 2 RFCA facility prior to the performance of this RLC/PDS effort. A Type 2 RLC had not yet been performed in this building because the building had been in operation until recently, thus the majority of the building surfaces were inaccessible for characterization. Since the performance of this RLC/PDS effort was performed in accordance with the Pre-Demolition Survey Plan (MAN-127-PDSP), no further characterization of building is necessary.

Results indicate that no beryllium contamination exists in excess of the PDSP unrestricted release limits. Although the radiological surveys of the building were less than the PDSP unrestricted release limits, there were five inaccessible, embedded floor drains and two trenches that are potentially contaminated and will be managed as LLW during demolition, or until proven otherwise. Most of the asbestos abatement activities have been completed, the only remaining ACM to be abated is the exterior window caulking and transite panels which will be completed prior to demolition. Based on the analysis of radiological, chemical and physical hazards, Building 331 Garage is classified as a RFCA Type 2 facility pursuant to the RFETS Decommissioning Program Plan (DPP; K-H, 1999) due to the potentially contaminated floor drains. Building 331 Garage can be demolished and the waste managed as sanitary waste and LLW as appropriate.

Please notify Kaiser-Hill when you transmit this document to CDPHE. If you have any questions, do not hesitate to call me or Duane Parsons at extension 6458.

[Signature]
 Dennis W. Ferrera
 Vice President and Project Manager
 Remediation, Industrial D&D and Site Services

DLP:pm

Enclosure:
 As Stated

Orig. and 1 cc - G. Morgan

Kaiser-Hill Company, L.L.C.
 Rocky Flats Environmental Technology Site, 10808 Highway 93, Unit B, T130F, Golden, CO 80403-8200 • (303) 966-6458

CORRES. CONTROL
INCOMING LTR NO.

Q0302 RFQ5

DUE DATE
ACTION



RECEIVED

Department of Energy

2005 JUN 13 P 3: 27

ROCKY FLATS PROJECT OFFICE
12101 AIRPORT WAY, UNIT A
BROOMFIELD, COLORADO 80021-2583

02
CORRESPONDENCE
CONTROL

JUN - 7 2005

05-DOE-00354

DIST.	LTR	ENC
BERARDINI, J.H.	X	
BOGNAR, E.S.	X	
BROOKS, L	X	
CARPENTER, M.	X	
CIUCCI, J.A.		
CROCKETT, G. A.	X	
DECK, C. A.	X	
DEGENHART, K. R.	X	
DEL VECCHIO, D.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
GILPIN, H.		
LINDSAY, D. C.	X	
LONG, J. W.		
NESTA, S.	X	
SHELTON, D. C.	X	
SPEARS, M. S.		
TUOR, N. R.	X	
WARD, D.	X	
WIEMELT, K.	X	
ZAHM, C.	X	

Free both C & X

COR. CONTROL	X	
ADMIN. RECORD	X	
PATS		

Reviewed for Addressee
Corres. Control RFP

6-13-05

Date _____

By

Ref. Ltr. #

DWF0.3605

DOE ORDER #

5400.1

Mr. Steven H. Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Dear Mr. Gunderson:

Please find enclosed the Reconnaissance Level Characterization Report/Pre-Demolition Survey Report for Building 331 Garage, DWF-036-05. This report characterizes the physical, chemical and radiological hazards associated with this facility, summarizes the characterization activities, defines the Data Quality Objectives developed for this characterization, and presents the data quality assessment, verification and validation of the results. Building 331 had been anticipated to be a Type 2 facility, but a Reconnaissance Level Characterization was not previously performed due to the facility being in operation, rendering significant areas inaccessible. Performance of the Reconnaissance Level Characterization and the Pre-Demolition Survey (RLC/PDS) were performed in accordance with the Pre-Demolition Survey Plan (MAN-127-PDSP); therefore, no further characterization of this structure is necessary.

The RLC/PDS results indicate that no beryllium contamination exist in excess of the PDSP unrestricted release limits. The radiological surveys of the building were less than the PDSP unrestricted release limits; however, two trenches and five inaccessible, embedded floor drains are potentially contaminated and will either be managed as Low Level Waste or surveyed during demolition to verify they meet the unrestricted release criteria and then managed as sanitary waste. Asbestos abatement has been completed except for the exterior window caulking and transite panels which will be completed prior to demolition.

Based upon this RLCR/PDSR and subject to concurrence by the Colorado Department of Public Health and Environment, B331 Garage is a Rocky Flats Cleanup Agreement Type 2 Facility pursuant to the Rocky Flats Environmental Technology Site Decommissioning Program Plan (DPP; K-H, 1999) due to the potentially contaminated floor drains and trenches and is ready for demolition.

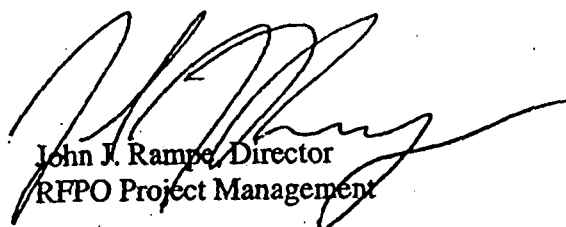
Mr. Steven H. Gunderson
05-DOE-00354

2

JUN - 7 2005

Questions may be directed to Gary Morgan, Rocky Flats Project Management, at
(303) 966-6003.

Sincerely,



John J. Rampe, Director
RFPO Project Management

Enclosure

cc w/o Encl:

S. Nesta, K-H RISS Env
C. Freiboth, K-H RISS D&D
K. Wiemelt, K-H RISS D&D
M. Aguilar, USEPA
D. Abelson, RFCLOG

cc w/Encl:

G. Morgan, RFPM, RFPO
D. McCranie, HQCPM, RFPO
Administrative Record

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 05/25/05 - 1430

Site Contact(s): C. J. Freiboth (KH) - (CJF-090)
Phone: (303) 966-2823

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 331G Asbestos Abatement

Meeting Attendance: C. J. Freiboth, KH David Kruchek, CDPHE
D. Parsons, KH

Discussion

On May 25, 2005, at 1400 a walkdown of the garage portion of Building 331 (B331G) was conducted to evaluate completing asbestos removal. This asbestos removal includes removing windows with asbestos caulking and exterior transite sheet. Areas of the building were previously used as a laboratory for handling beryllium and radioactive material. Floor drains were installed which drained into the Sanitary Sewer system, and one of the floor drains is marked as being radioactively contaminated. These drains flowed into a piping system that was placed into the eastern north-south trench. When the laboratory was removed, the floor drains were plugged, and the pipe in the trench was removed. Some portions of the trench system were filled with concrete once the drains were plugged. Because of this, the facility will be typed as a RFCA Type II facility. Radiological survey data and beryllium survey data was presented to the State that shows that the facility on and above the slab is non-contaminated. There is the potential that the trenches contain concrete encased contamination. Because of this, precautions will be taken to protect the slab and trenches are removed during demolition activities. This includes the following:

- (1) The plugged floor drains and lines will be considered potentially contaminated and properly protected, segregated and removed prior to or during demolition. The concrete filled trenches will also be considered potentially contaminated and properly protected, segregated and removed prior to or during demolition. For all potentially contaminated work, the appropriate radiological controls will be implemented.
- (2) During slab, trench and line removal, ER soil samples will be collected as necessary based on any evidence of staining, elevated radiological readings, leak points, or other identified concerns/releases.

- (3) The closeout report will contain the results of all actions taken or document the rationale why actions were not taken.

On May 25, 2005, at 1430, the State (Kruchek) concurred with the completion of the asbestos removal in the B331G. Removal of the windows and transite will breach the facility, but the openings will be covered with plastic. Typically, a Facility Component Removal RSOP is required for asbestos abatement in RFCA Type II facilities. Because the potentially contaminated areas are in the trenches and below the slab, completion of the asbestos abatement will not require a Facility Component Removal RSOP Notification nor a 6-point analysis.

Contact Record Prepared By: C. J. Freiboth

Required Distribution:

M. Aguilar, USEPA
R. Birk, DOE
C. Deck, KH
S. Garcia, USEPA
C. Gilbreath, KH
S. Gunderson, CDPHE
S. Johnson

D. Kruchek, CDPHE

K. Lavorato, KH

J. Legare, RFFO

R. Leitner, KH

D. McCrane, DOE

G. Morgan, DOE

S. Nesta, KH

M. Roy, DOE

R. Schassburger, DOE

D. Shelton, KH

J. Walstrom, KH

C. Zahm, KH

Additional Distribution:

C. J. Freiboth, KH

D. Parsons, KH

8

The scope of this demolition will include Building 331 Garage.

Building 331 Garage was an anticipated Type 2 facility. The Reconnaissance Level Characterization Report (RLCR)/Pre-Demolition Survey Report (PDSR) - 05-RF-00520, dated May 26, 2005, documents the condition of Building 331 Garage. As stated in the RLCR/PDSR, B331 did not meet the unrestricted release criteria due to potential radiological contamination in five embedded sanitary waste drains and piping in the concrete slab. The sanitary waste drains and piping ran through open trenches in the slab. The sanitary waste piping in the open trenches was removed and some of the open trenches were filled with concrete in the 1960's or 1970's when the building was converted from a research and development laboratory to a vehicle maintenance facility. Therefore, the remaining embedded sanitary waste drains and piping will be managed as LLW during demolition. The filled in trenches will be managed as potentially contaminated LLW until demolition and in-process demolition surveys prove otherwise. Environmental Remediation will conduct soil sampling once the slab is removed by RISS D&D.

The point of contact for this project is Cameron Freiboth, who may be reached at x2823.

CERCLA Administrative File

- RLCR/PDSR for Building 331 Garage - 05-RF-00520 (submitted May 26, 2005)

10

Activity ID	Activity Description	Orig Dur	Rem Dur	% Comp	Early Start	Early Finish	Total Float	FY05		
								Q2	Q3	Q4
1EFD0930	B331 Decommissioning Planning & Engineering	87	38	75	01APR05A	28JUL05	44			
1EFD0950	B331 Decommissioning Dismantlement	43	26	40	04APR05A	07JUL05	44			
1EFD0945	B331 Decommissioning Decontamination	46	30	40	04APR05A	14JUL05	44			
1EFD0940	B331 Decommissioning Final Surveys	20	20	82	04APR05A	18JUL05	50			
1EFD0955	B331 Decommissioning Demolition & Disposal	15	15	0	19JUL05	08AUG05	55			

Start Date 01FEB99
 Finish Date 25OCT05
 Data Date 23MAY05
 Run Date 07JUN05 14:30

CPBA

CURRENT STATUS (5/23 CPBA)

B331 Demolition

Sheet 1 of 1

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

June 9, 2005

Mr. John J. Rampe
Director, RFPO Project Management
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

**RE: Reconnaissance Level Characterization Report (RLCR) and Pre-Demolition Survey Report (PDSR)
for Building 331 Garage – Concurrence and Approval**

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR/PDSR for Building 331 Garage; Revision 0 dated May 26, 2005. We received a copy of your letter regarding this RLCR/PDSR on June 7, 2005. We provided comments and received revisions to this RLCR/PDSR. Based on the information contained in the RLCR/PDSR, with revisions, we are hereby concurring with the determination that Building 331 Garage is a Type 2 Facility. We are also approving this PDSR, as revised, for Building 331 Garage.

Although we are approving the PDSR for B331 Garage, please provide the appropriate actions (work plan and RSOP Notification) to properly protect, remove, and dispose of the contaminated portions of B331G. We also expect appropriate investigation, including soil sampling, of potentially contaminated areas that may be identified under the slab, or associated pavement, during demolition of B331.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Augilar, EPA
Sam Garcia, EPA
Duane Parsons, KH

Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records – Mountain View

Colorado Department of Public Health and Environment
Air Pollution Control Division – Stationary Sources Program – Indoor Air Unit
4300 Cherry Creek Drive South, APCD-SS-B1
Denver, Colorado 80246-1530
Phone: 303-692-3100 – Fax: 303-782-0278
E-mail: asbestos@state.co.us

DEMOLITION APPROVAL NOTICE

This approval notice is granted subject to Colorado Air Quality Control Commission Regulation No. 8, Part B, adopted December 16, 2003, and effective March 2, 2005, the Colorado Air Pollution Prevention and Control Act C.R.S. (25-7-101 and 25-7-501 et seq). This notice signifies that the structure was inspected for asbestos and CFCs and the demolition contractor has properly notified the Colorado Department of Public Health and Environment pursuant to Regulation No. 8, Part B.

As a contractor, you may be subject to other demolition licenses and permits, depending on the requirements of the county and municipality in which the work is being performed. The Colorado Department of Public Health and Environment, Air Pollution Control Division, strongly suggests that you check with county and municipal authorities in order to determine any other local building/permitting requirements that must be met.

THE ORIGINAL PERMIT MUST BE POSTED ON SITE AT ALL TIMES.

Immediately notify the Unit of project modifications by fax (number above) or e-mail (address above) and the appropriate county health department by fax. Project modifications include changes in the scope of work or the scheduled work dates, etc.

This demolition notice is valid beginning 6/16/2005 through 11:59 PM on 9/14/2005.
The actual scheduled work dates are from 6/16/2005 through 9/14/2005.

Approval issued on: 6/15/2005

Record number: 46930

Notice Number: 05JE2592D

For the location specified below:

Bldg. 331G

RFETS, 10808 Hwy 93

Golden

Jefferson County

This notice has been issued to:

**Kaiser Hill Construction
RFETS, 10808 Hwy 93, T130F
Golden, CO 80403**

Amount Paid: \$55.00

Check number: 160819

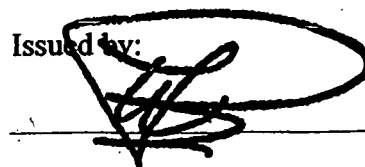
Asbestos Building Inspector:

Charles W. McGlothlin, III

Certification No.: 9107

Inspection Date: 06/13/2005

Issued by:



**Department of Energy**

ROCKY FLATS PROJECT OFFICE
12101 AIRPORT WAY, UNIT A
BROOMFIELD, COLORADO 80021-2583

JUN 29 2005

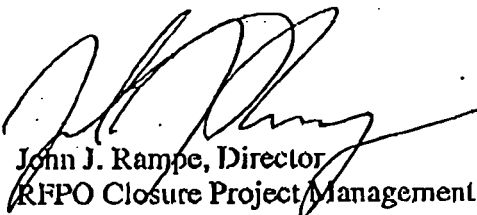
05-DOE-00410

Mr. Steven H. Gunderson
RFCA Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Disposition, this letter and its enclosure are notification for RSOP implementation. This notification is for all activities required to demolish and disposition Building 331, Garage.

Questions can be directed to Gary P. Morgan, of my staff, at (303) 966-6003.


John J. Rampe, Director
RFPO Closure Project Management

Enclosure

cc w/o Encl:

S. Nesta, K-H RISS Env
C. Freiboth, K-H RISS D&D
K. Wiemelt, K-H RISS D&D
M. Aguilar, USEPA
D. Abelson, RFCLOG

cc w/Encl:

G. Morgan, RFPM, RFPO
D. McCranie, HQCPM, RFPO
Administrative Record

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

June 30, 2005

Mr. John Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

Post-it® Fax Note	7671	Date	6/30	# of pages	2
To	Cameron Freiboth	From	David Kruchek		
Co./Dept.	RIT	Co.	COPHE		
Phone #		Phone #			
Fax #		Fax #			

RE: B331 Garage Facility Disposition RSOP Notification

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your June 29, 2005 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of Building 331 Garage. We hereby agree that Building 331 Garage may be demolished utilizing the Facility Disposition RSOP, with additional actions to protect, manage, and remove the remaining radiological contamination in B331 Garage as indicated.

Since the specific activities to be performed during the demolition of B331 Garage to identify, protect, manage, and remove the remaining radiological contamination in the filled trenches and embedded pipes are not included in this Notification, we expect these activities will be provided in the Work Plans prior to demolition of B331 Garage.

This and other issues that may arise during demolition activities may be resolved utilizing the consultative process, with resolutions captured in Contact Records, as well as in the Closeout Report for B331 Garage.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Sam Garcia, EPA
Duane Parsons, KH
Administrative Records - Mountain View

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
J. Mike Swartz, KH